UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS WESTERN DIVISION

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	CIVIL ACTION NO.:	
**************************************	U.S. DISTRICT COURT DISTRICT OF MASS.	
Plaintiff) v.)	04-40050	-NiiG
VIVIAN BOATENG,) Defendant) ***********************************		

COMPLAINT AND DEMAND FOR JURY TRIAL

- 1. The Plaintiff Margaret Opokua is an individual and a resident and citizen of Ghana.
- 2. The Defendant Vivian Boateng is an individual and a resident of the City and County of Worcester, Commonwealth of Massachusetts.
- 3. At all times material hereto, the Defendant, together with her husband jointly owned and maintained the property at 70 Fourth St., Worcester, Massachusetts.
- 4. On or about August 21, 2002, the Plaintiff, while lawfully upon the Defendant's premises, was caused to fall as a result of the Defendant's negligence and carelessness in the maintenance of her property.
- 5. As a direct and proximate result, the Plaintiff was injured, required medical treatment for her injuries, experienced pain, suffering and emotional distress, and has been disabled from her usual activities.

Wherefore, Plaintiff demands judgment of the Defendant in the amount of her damages, plus interest and costs.

PLAINTIFF HEREBY DEMANDS A JURY TRIAL OF ALL ISSUES TRIABLE AS OF RIGHT BY JURY.

Plaintiff, By her attorney RECEIPT # 7/12 AMOUNT \$__ Douglas L. SUMMONS ISSUED_ BBO#: 176380 LOCAL RULE 4.1__ SHUMWAY, GIGUERE & FOX, PC WAIVER FORM_ 19 Cedar Street MCF ISSUED_ Worcester, MA 01609 BY DPTY. CLK. (508) 756-2323

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